

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MAINE

INTERNATIONAL UNION OF OPERATING)	
ENGINEERS, LOCAL 4; INTERNATIONAL UNION)	
OF OPERATING ENGINEERS LOCAL 4 HEALTH)	
AND WELFARE FUND; INTERNATIONAL UNION)	
OF OPERATING ENGINEERS LOCAL 4 PENSION)	
FUND; INTERNATIONAL UNION OF OPERATING)	
ENGINEERS LOCAL 4 ANNUITY FUND,)	
)	
)	Civil Action No. 07-cv-47
Plaintiffs,)	
)	
v.)	
)	
STANLEY EXCAVATION,)	
)	
Defendant.)	

PLAINTIFFS' MOTION FOR ENTRY OF DEFAULT

Plaintiffs, by and through the undersigned counsel, hereby move for entry of default against Defendant Stanley Excavation, and in support thereof state as follows:

1. The Complaint in this matter was filed with the Court on April 9, 2007.
2. Defendant Stanley Excavation was served with a Summons and copy of the Complaint in this action by manner of a Chief Civil Deputy placing the material in question at the Defendant's place of business, 30 Morrill Street, Buckfield, Maine with a person of suitable age, a Ms. Donithy White, on May 15, 2007.
3. Defendant Stanley Excavation having failed to answer the Complaint within twenty days of service, Plaintiffs hereby move for entry of default against Defendant Stanley Excavation.

Respectfully submitted,

Dated: June 25, 2007

/s/ Jeffrey Neil Young

Jeffrey Neil Young, Esq.

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& Toker, P.A.

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Counsel to Plaintiffs

So Ordered: _____

United States District Judge

CERTIFICATE OF SERVICE

I, Jeffrey Neil Young, hereby certify that on June 25, 2007, I electronically filed Plaintiffs' Motion for Entry of Default with the Clerk of the Court using the CM/ECF system and that I have sent on date same a copy of said filing to the Defendant at the following address via U.S. Mail: Stanley Excavation, 30 Morrill Street, P.O. Box 321, Buckfield, ME 04220.

/s/ Jeffrey Neil Young

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